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MEMO ENDORSED

June 28, 2023

Via ECF

The Honorable Valerie E. Caproni, U.S.D.J.
United States District Court
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Himatsingka America Inc. v. Nicole Finn*, Case No. 23-cv-3992 (VEC)

Your Honor:

This firm represents the Plaintiff in the above-referenced matter. We write on behalf of both parties to respectfully request an adjournment of the Initial Pretrial Conference ("IPTC") and a 45-day extension of all deadlines, including Defendant's time to respond the Complaint.

Defendant's response to the Complaint is currently due on June 30, 2023, the IPTC is currently scheduled for July 14, 2023 at 10:00 a.m., and the joint letter is due on July 6, 2023. (ECF #5). Since this action for alleged violation of the Defend Trade Secrets Act was filed, Defendant has retained new counsel, and the parties have been discussing steps which may lead to a resolution of this matter. Rather than expending additional time and effort on advancing the litigation, and consuming judicial resources, the parties believe that their efforts would be better spent on exploring a potential resolution.

This is the first request for an adjournment of the IPTC and initial deadlines. Defendant previously requested and was granted an extension of the time to respond to the Complaint. (ECF #9).

The parties are available for a new IPTC on September 8, 2023 or thereafter.

Respectfully submitted,

A handwritten signature in black ink that reads "Robert I. Steiner".

Robert I. Steiner

cc: Counsel for Defendant via ECF.

NEW YORK WASHINGTON, DC CHICAGO HOUSTON LOS ANGELES SAN DIEGO PARSIPPANY STAMFORD

Application GRANTED. Defendant's deadline to answer or otherwise respond to the complaint is **August 14, 2023**. The initial pretrial conference is ADJOURNED to **Friday, September 15, 2023, at 10:00 A.M.** in Courtroom 443 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, New York, 10007. The parties' pre-conference submissions, as described at Dkt. 5, are due on **September 7, 2023**. No further adjournment or extension requests will be granted absent good cause in light of the lengthy adjournment.

The parties may, at any time, submit a joint request for a referral to the Court-annexed mediation program or to the assigned magistrate judge for a settlement conference.

SO ORDERED.

 06/28/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE